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GAAC: USAO 2013R00273

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

SHANE ELLIOTT HARE, and  
GREGORY ANTOINE WILLIAMS,

Defendants.

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DKC13 CR 0650

CRIMINAL NO.

Conspiracy to Interfere with  
Commerce by Robbery, 18 U.S.C.  
§ 1951(a); Conspiracy to Possess with  
the Intent to Distribute Cocaine,  
21 U.S.C. § 846; Conspiracy to Possess  
a Firearm in Furtherance of a Drug  
Trafficking Crime and Crime of  
Violence, 18 U.S.C. § 924(o);  
Possession of a Firearm in  
Furtherance of a Drug Trafficking  
Crime and Crime of Violence,  
18 U.S.C. § 924(c); Aiding and  
Abetting, 18 U.S.C. § 2; Forfeiture,  
18 U.S.C. § 924(d), 28 U.S.C. § 2461(c))

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INDICTMENT

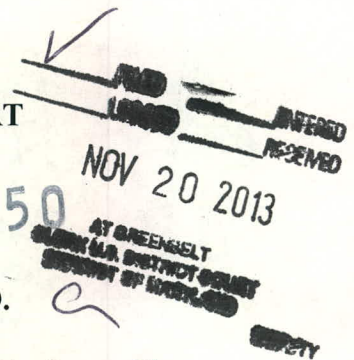
COUNT ONE

The Grand Jury for the District of Maryland charges that:

Between in or about April 2013 and on or about May 16, 2013, in the District of  
Maryland and elsewhere, the defendants,

SHANE ELLIOTT HARE, and  
GREGORY ANTOINE WILLIAMS,

did knowingly and unlawfully conspire with each other and persons, known and unknown to the  
Grand Jury, to knowingly and intentionally obstruct, delay and affect, and attempt to obstruct,  
delay and affect commerce and the movement of articles and commodities in commerce by  
robbery, as those terms are defined in 18 U.S.C. § 1951, in that the defendants conspired to



unlawfully take narcotics from the person or presence of victims, against the victims' will by means of actual and threatened force, violence, fear of injury, immediate and future, to their persons and property.

18 U.S.C. § 1951(a)

**COUNT TWO**

The Grand Jury for the District of Maryland further charges that:

Between in or about April 2013 and on or about May 16, 2013, in the District of Maryland and elsewhere, the defendants,

**SHANE ELLIOTT HARE, and  
GREGORY ANTOINE WILLIAMS,**

did knowingly and intentionally conspire with each other and others known and unknown to the Grand Jury to possess with intent to distribute five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

21 U.S.C. § 846

**COUNT THREE**

The Grand Jury for the District of Maryland further charges that:

Between in or about April 2013 and on or about May 16, 2013, in the District of Maryland and elsewhere, the defendants,

**SHANE ELLIOTT HARE, and  
GREGORY ANTOINE WILLIAMS,**

did knowingly and unlawfully conspire with each other and other persons, known and unknown to the Grand Jury, to knowingly, intentionally and unlawfully possess a firearm in furtherance of a drug trafficking crime and a crime of violence for which they may be prosecuted in a court of the United States, to wit: conspiracy to interfere with commerce by robbery, as set forth in Count One of this Indictment, and conspiracy to possess with intent to distribute five kilograms or more of cocaine, as set forth in Count and Two of this Indictment, which are incorporated here.

18 U.S.C. § 924(o)



**COUNT FOUR**

The Grand Jury for the District of Maryland further charges that:

On or about May 16, 2013, in the District of Maryland and elsewhere, the defendants,

**SHANE ELLIOTT HARE, and  
GREGORY ANTOINE WILLIAMS,**

did knowingly and intentionally possess a firearm in furtherance of a drug trafficking crime and a crime of violence for which they may be prosecuted in a court of the United States, to wit: conspiracy to interfere with commerce by robbery, as set forth in Count One of this Indictment, and conspiracy to possess with intent to distribute five kilograms or more of cocaine, as set forth in Count Two of this Indictment, which are incorporated here.

18 U.S.C. § 924(c)

18 U.S.C. § 2

**FORFEITURE ALLEGATION**

The Grand Jury for the District of Maryland further charges that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), as a result of the defendants' conviction for an offense in violation of Title 18, United States Code, Section 924(o) and Title 18, United States Code § 924(c), as set forth in Counts Three and Four of this Indictment.

2. As a result of the offenses set forth in Count Three and Four of the Indictment, the defendants,

**SHANE ELLIOTT HARE, and  
GREGORY ANTOINE WILLIAMS,**

shall forfeit to the United States any firearm and ammunition involved or used in such offense, including but not limited to: (1) a Kimber .45 caliber pistol, model Pro BP Ten II, bearing serial number KPA16036 and loaded with 12 rounds of Winchester .45 caliber ammunition; and (2) a Beretta 9mm pistol, model 92FS Desert Storm, bearing serial number DS005114 and loaded with 15 rounds of assorted 9mm ammunition.

18 U.S.C. § 924(d)  
28 U.S.C. § 2461(c)

*Rod J. Rosenstein / CAR*

Rod J. Rosenstein  
United States Attorney

A TRUE BILL:

**SIGNATURE REDACTED**

*[Signature]*  
Foreperson

*Nov 20, 2013*  
Date